

Felipe Gomez)	United States District Court
)	Northern District of Illinois
Plaintiff)	Case # _____
)	Fair Housing Act, 42 USC 3601
v.)	Conspiracy, 42 USC 1985
Robert "Bobby" Loncar, Loncar Law)	
Ltd., and Linda Schmid)	JURY DEMAND
Defendants)	

COMPLAINT

1. On August 30, 2018, Landlord Schmid filed a joint eviction against 58 year old Plaintiff-Tenant in Cook County Circuit Court (18M1714022), seeking money and possession for failure to pay rent at his unit in Chicago, Illinois.
2. Immediately after being notified of the lawsuit, undersigned notified Defendant Loncar (sued personally and as Loncar Law Ltd, collectively "Bobby") the Defendant Schmid had been as was continuing to steal Plaintiff's electric, that reduced rent had been offered and refused, and that the theft had been documented by Comed and other entities and was under active investigation by the authorities, that the lawsuit was in retaliation for reporting her, and demanded that Bobby have his client immediately cease and desist from stealing and that the lawsuit be settled by Plaintiff offering possession by the end of November.
3. Bobby refused possession and has steadfastly refused to have his client cease her theft and various other harrassments such as tearing down Plaintiff's laundry and spitting on it, all of which actions Bobby was repeatedly notified of and demanded to correct, and on information and belief, Bobby has either knowingly allowed or encourages, and has instead continued to litigate the case despite knowing its harrassing nature and the ongoing theft of electric service.
4. Plaintiff has suffered injury and damages as a direct result of Bobby and Schmid's illegal conspiracy to steal and harrass Plaintiff.
5. Plaintiff alleges that such conduct violates Plaintiff's rights under 42 USC 3601 et seq, and rises to a violation of 42 USC 1985 in doing so.

WHEREFORE, Plaintiff respectfully seeks that this Court order that the electric theft and other harrasment of Plaintiff cease immediately, that the Defendants be found liable to Plaintiff for violating 42 USC 360, et seq. adn 42 USC 1985, and that Plaintiff be awarded his out of pocket damages, \$50,000 in punitive damages, and attorney's fees and costs.

Submitted By: s/ **Felipe Gomez**

Dated: 10.1.18